

ATTACHMENT F-2
DEFENDANT'S WITNESS LIST

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION**

SANTANA BRYSON and JOSHUA
BRYSON, as Administrators of the
Estate of C.Z.B., and as surviving
parents of a deceased minor, C.Z.B.,

Plaintiffs,

v.

ROUGH COUNTRY, LLC,

Defendant.

Civil Action No.

2:22-CV-17-RWS

ATTACHMENT “F-2”

DEFENDANT’S WITNESS LIST

Defendant Rough Country, LLC will have present at trial:

1. None.

Defendant may have present at trial:

2. Patrick Just, Rough Country, 2450 Huish Rd., Dyersburg, TN 38024.
3. Ken Dunn, Rough Country, 2450 Huish Rd., Dyersburg, TN 38024.
4. Rad Hunsley, Rough Country, 2450 Huish Rd., Dyersburg, TN 38024.
5. Charles Crosby, P.E., Exponent, 23445 North 19th Ave., Phoenix, AZ

85027. Mr. Crosby is expected to testify regarding the exemplar vehicle crash test that he (Exponent) performed on May 15, 2023, involving a 2016 Ford F-250 pickup

and a 2008 Ford Escape. He is expected to testify as to the parameters, measurements, and results of the crash. Mr. Crosby will also testify as to the specific details of the vehicles involved in the exemplar crash testing, the details regarding the procedure and parameters for the test, his recording of the test, and his photographs and recording of the exemplar vehicles following the test. Mr. Crosby was previously disclosed to Plaintiffs in compliance with Rule 26, and his expert report has been provided to Plaintiffs.

6. Wesley Grimes, P.E., Mecanica Scientific Services, 2812 N. Norwalk, Suite 123, Mesa, AZ 85215. Mr. Grimes is expected to testify as to the accident reconstruction of the collision in this case, including his inspection and documentation of the crash site, the vehicles involved in the subject crash, and an analysis of the crash. Mr. Grimes is expected to testify as to the forces and interactions of the vehicles and the dynamics of the vehicle crash, including the deformation, accelerations, delta-Vs, and rear seat deformation in the Escape. Mr. Grimes will also testify as to the exemplar vehicle crash test that was performed by Exponent (Mr. Crosby), involving an exemplar F-250 in the original OEM configuration. Mr. Grimes will explain that the exemplar vehicle crash test showed substantially similar deformation, accelerations, delta Vs, and Escape rear seat deformation as the subject crash, and therefore the deformation and accelerations of the Ford Escape would have been substantially similar whether the F-250 was lifted

or was equipped with a stock suspension. Mr. Grimes will also testify regarding his analysis of the HVE simulation performed by Plaintiffs' expert, G. Bryant Buchner. Mr. Grimes was previously disclosed to Plaintiffs in compliance with Rule 26, and his expert report has been provided to Plaintiffs.

7. Lisa P. Gwin, D.O., BSEE, BSN, Biodynamic Research Center, 12810 West Golden Lane, San Antonio, TX 78249-2231. Dr. Gwin is expected to testify about the biomechanics and occupant kinematics in the subject accident and in the exemplar vehicle crash testing performed by Exponent (Mr. Crosby). Dr. Gwin will opine about the biomechanics of the occupants inside the Plaintiffs' Escape at the time of the incident, the cause of injury and death to C.Z.B., and the forces experienced by C.Z.B. in the subject crash. Dr. Gwin is also expected to testify regarding the same subjects in relation to the vehicle crash testing performed at Exponent, including all aspects of the exemplar crash testing and the results and conclusions related to that crash testing. Dr. Gwin is expected to testify that, based upon the exemplar crash testing and her analysis of the subject incident, if Mr. Elliott's Ford F-250 had been equipped with a stock suspension, there would still have been intrusion of the rear structures and deformation of the second row seat, more likely than not leading to the same outcome for C.Z.B. Dr. Gwin was previously disclosed to Plaintiffs in compliance with Rule 26, and her expert report has been provided to Plaintiffs.

8. Robert J. Pascarella, Tandy Engineering & Associates, Inc., 32430 Dobbin Huffsmith Road, Magnolia, Texas 77354. Mr. Pascarella is expected to testify regarding Ford Motor Company's knowledge and experience with its independent dealers regarding after-market lift kits and the Ford F-250's Owner's Manual with regard to the warnings contained therein. More specifically, Mr. Pascarella is expected to testify that the warnings contained in the subject F-250's Owner's Manual regarding the installation of aftermarket modifications, including lift kits, do not constitute a blanket restriction of all aftermarket modifications, and do not in any way relate to any risk of vehicle-to-vehicle compatibility and/or override or intrusion. Mr. Pascarella was previously disclosed to Plaintiffs in compliance with Rule 26, and her expert report has been provided to Plaintiffs.

9. Trooper Andrew Phillips, Georgia State Patrol, 402 Belwood Rd., SE, Calhoun, GA 30701.

10. Jonathan Eisenstat, M.D., 3121 Panthersville Road, Decatur, GA 30034.

11. Any witness listed by Plaintiffs.

12. All witnesses deposed or to be deposed.

13. Any witnesses necessary for rebuttal or impeachment purposes.

14. Any witnesses necessary to authenticate documents.